

FILED 12 SEP '14 15:11 USDC-ORE

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

Mark A. CHANEY

(Enter full name of plaintiff(s))

Plaintiff(s),

v.

Civil Case No. 6:14-cv-01463-MC  
(to be assigned by Clerk of the Court)

COMPLAINT

Jury Trial Demanded

☐ Yes

☒ No

VOLUNTEERS IN MARINE  
Deleesa Meashin-tuby Exec Dir  
Michael Taylor MD MEDICAL DIRECTOR  
(Enter full name of ALL defendant(s))

Defendant(s).

I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

Plaintiff

Name: Mark A CHANEY  
Street Address: 3998 Franklin BLV #42  
City, State & Zip Code: Eugene OR 97403  
Telephone No. 503-881-7028

Defendant No. 1

Name:

Volunteers IN MEDICINE Clinic

Street Address:

2260 Marcola Rd

City, State &amp; Zip Code:

Springfield, OR 97477

Telephone No.

541-685-1800

Defendant No. 2

Name:

Deleesa MEASHINTUBBY Exel Dir

Street Address:

2260 Marcola Rd

City, State &amp; Zip Code:

Springfield OR 97477

Telephone No.

541-685-1800

Defendant No. 3

Name:

Michael JIM MD MED Dir

Street Address:

2260 Marcola Rd

City, State &amp; Zip Code:

Springfield OR 97477

Telephone No.

541-685-1800

Defendant No. 4

Name:

Carmen E ADMIRE

Street Address:

2260 MARCOLA RD

City, State &amp; Zip Code:

Springfield OR 97477

Telephone No.

## II. JURISDICTION

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. A case involving the United States Constitution or federal laws or treaties is a federal question case. A case in which a citizen of one state sues a citizen of another state and the amount in damages claimed is more than \$75,000 is a diversity of citizenship case.

A. What is the basis for federal court jurisdiction (check all that apply)

☒ Federal Question

☐ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory, or treaty right is at issue?

Violation of the 8th Amendment  
 CRUEL AND UNUSUAL  
 ACTING OUT OF THERE SCOPE OF EMPLOYMENT  
 Intentional Infliction of Physical  
 AND Emotional Pain

- C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state of citizenship

OR

Defendant(s) state(s) of citizenship

### III. STATEMENT OF CLAIMS

#### Claim I

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

Failure to Monitor Prescribing Medications  
 AND Failing to Check medication with  
 other medication.  
 DR Jay AND Carmen ADMIRE are the  
 main Defendant's - Delores Meashintobly  
 failed to over see her employees and  
 volunteer I was and still am in health  
 issues related to being over dosed  
 AND under monitoring

## Claim II

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

Working out of the Scope of Employment -

Not passing along to Neal - 9:30 AM  
After many attempts to understand what was happening I WAS SO SCARED AND BODILY AT TIMES I WANTED TO DIE  
She would TEXT ME at 2 AM telling me NOT TO cry its worth it

DR JAY did mean "counseling" than  
DOES EXAMS - I WAS TRYING TO  
find out why to an inappropriate relationship

that I reported to  
Carmen DeLese, DR JAY, DR Schore All took my Report  
Nothing Done

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

MISSING or Altered Files - I have  
A set my SSN Attorney got a set  
AND then the new one with  
All the Carman stuff like when  
getting extra medication for her and  
I Trazadone for her  
Cialis  
Lynx

Pharmacy BOARD is taking  
All Violations to a Hearing Oct 7 2014  
Med. Bd. Closed Case Now  
Letter of Concern was sent to them

(If you have additional claims, describe them on another piece of paper, using the same outline.)

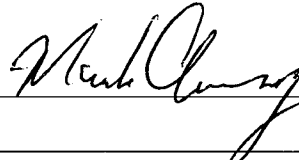
## IV. RELIEF

State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.

the pain AND Suffering of live  
 nothing I could describe - ALONE  
 Suffered for months then  
 NOT taking proper care -  
 I Am Asking for \$50,000 NO  
 Jury ALSO Asking Damages Amount  
 to the Judge

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 12 day of September, 2014.



(Signature of Plaintiff(s))